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December 3, 2018

BY ECF

Ruby J. Krajick, Clerk of Court
United States District Court for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: Neal v. Wilson et al., No. 15-CV-2822 (RA) (GWG)

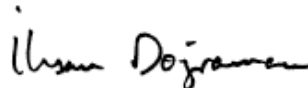
Dear Ms. Krajick:

We are *pro bono* counsel for plaintiff Christopher Neal. Please find attached a Declaration by plaintiff supplementing the Objection to Defendants' Bill of Costs (ECF No. 168) filed November 29, 2018. Prior to November 30, 2018, *pro bono* counsel had been unable to reach plaintiff. As stated in the Objection filed November 29, 2018:

Pro bono counsel for plaintiff has prepared this Objection based on information publicly available in this case. Despite numerous efforts by FedEx, by e-mail, and by telephone, the undersigned has been unable to make contact with plaintiff since October 11, 2018.

(See ECF No. 168, at 1 n.1.) On November 30, 2018, however, plaintiff contacted the undersigned. On December 1, 2018, plaintiff executed the attached Declaration of Christopher Neal in Opposition to Defendants' Application for Costs. Plaintiff respectfully requests consideration of the Declaration in connection with his Objection to Defendants' Bill of Costs.

Sincerely,



Ihsan Dogramaci

Attachment
cc (by ECF): Counsel of record.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHRISTOPHER NEAL,

plaintiff,

- against -

POLICE OFFICER ROMAIN WILSON,
POLICE OFFICER JUAN RODRIGUEZ,
POLICE OFFICER OSVALDO MALDONADO,
POLICE OFFICER COTY GREEN, POLICE
OFFICER BAUDILO GARCIARIVAS,
SERGEANT DAVID CAMHI, *and* SERGEANT
MICHAEL KAISER,

defendants,

No. 15-CV-2822 (RA) (GWG)

ECF Case

**DECLARATION OF CHRISTOPHER NEAL
IN OPPOSITION TO DEFENDANTS' APPLICATION FOR COSTS**

Christopher Neal declares under penalty of perjury and pursuant to
28 U.S.C. § 1746 that the following statements are true and correct:

1. I make this Declaration in opposition to defendants'
application for an award of costs in this case.
2. My financial situation would make it utterly impossible for
me to satisfy any award of costs.
3. I live in a homeless shelter located at 3339 Park
Avenue, Bronx, New York C.N.
4. One of the conditions of my living in the shelter is that I
consistently save half my income for the purpose of eventually providing myself a
home.

5. Attached to this Declaration is a copy of a recent paystub issued to me by my employer. As reflected in the paystub, my weekly income is \$

347.75 C.N.

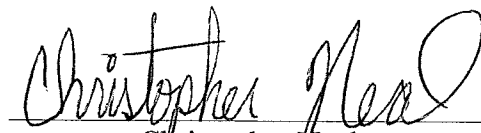
6. I have no other source of income. I have no savings to speak of.

7. Additionally, I must help to support two children, ages 8 and 10. I do this as a father. Separately, I understand this is mandated as part of my parole. C.N.

8. I understand that in this case the jury, having heard the evidence at trial submitted by me and by the six defendants, decided that I did not have enough evidence for a finding that all the elements of my claim were established by a preponderance. I have, however, pursued this case against defendant police officers in good faith. At the trial, I testified to the best of my ability.

9. Because I pursued this case in good faith, because the defense of this case was supported by the City of New York, and because I have no financial ability to satisfy any award of costs against me, I respectfully request that the Court exercise its discretion to disallow defendants' request for costs against me.

Dated: New York, New York C.N.
~~November~~, 2018
December 1, 2018



Christopher Neal

Check No: 725140 Date: 11/16/18

EMP# 960
CLOCK# 000960
DEPT# 000002
FED S 2
NY S 2
NY-NYCRS 2
NY-SDI

Type-Basis	Hours	Rate	Earnings	Ded Type	Amount	YTD	This Pay	YTD	
REGULAR -H	26.75	13.0000	347.75				EARNINGS	347.75	16568.50
							FEDERAL	11.70	670.32
							MEDICARE	5.04	240.26
							SOC SEC	21.56	1027.26
							NY	6.70	362.88
							NYNYCRS	5.03	269.46
							NYSOI	0.60	26.40
							NYPFL	0.44	20.91
			<u>YTD</u>						
REGULAR	1274.50		16568.50				Net Pay:	296.68	

NYC MESSENGER, INC. 15 EAST 40TH STREET SUITE 300 NEW YORK, NY 10016
Key: aN4j-9JY4-JHhy-JA3c Phone: (212)213-5050

Period Start: 11/05/18
Period End: 11/11/18  PRIMEPAY.

FOLD AND REMOVE →